

Representation - Draft Modification Report UNC 0856

Introduction of Trials for Non-Daily Metered (NDM) Demand Side Response (DSR)

Responses invited by: **5pm on 04 December 2023**

To: enquiries@gasgovernance.co.uk

Please note submission of your representation confirms your consent for publication/circulation.

Representative:	Claire Louise Roberts
Organisation:	ScottishPower
Date of Representation:	4 th December 2023
Support or oppose implementation?	Comments
Relevant Objective:	<p>a) Potentially (subject to more detail)</p> <p>b) Potentially (subject to more detail)</p> <p>f) None</p>
Relevant Charging Methodology Objective:	Not Applicable

Reason for support/opposition: Please summarise (in one paragraph) the key reason(s)

ScottishPower welcome the opportunity to respond to this consultation. Whilst we are in support of such initiatives that look to reduce stress on the gas networks, the modification lacks details of any potential benefits.

We do not have sufficient information to confirm our support or otherwise without additional detail for example an estimated demand reduction and understanding what the customer journey will be. We understand that “in order to run an NDM DSR Trial(s), NGT would be required to publish a Specification Document outlining the proposal and the details of the limited NDM DSR Trial(s). The specification document would be subject to consultation and would require Ofgem determination to confirm its approval, or rejection NGT would only be able to proceed with the NDM DSR Trial(s) in the form consulted upon following approval from Ofgem.” This will give us additional opportunity to comment on the details.

Implementation: *What lead-time do you wish to see prior to implementation and why?*

Subject to Ofgem decision, Shippers would need sufficient time to engage with consumers and make any necessary changes.

Impacts and Costs: *What analysis, development and ongoing costs would you face?*

We anticipate that there will be a cost, however we have not been able to fully impact assess these within the timescales given and as a result of the lack of detail.

Legal Text: *Are you satisfied that the legal text will deliver the intent of the Solution?*

Not reviewed

Are there any errors or omissions in this Modification Report that you think should be taken into account? *Include details of any impacts/costs to your organisation that are directly related to this.*

No comment

Please provide below any additional analysis or information to support your representation

Nothing further to add